

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**Re: D.I. 228**

**CERTIFICATION OF COUNSEL CONCERNING ORDER (A) ESTABLISHING  
BAR DATES AND RELATED PROCEDURES FOR FILING PROOFS OF  
CLAIM, INCLUDING CLAIMS ARISING UNDER SECTION 503(b)(9) OF  
THE BANKRUPTCY CODE, (B) APPROVING THE FORM, MANNER, AND  
PROCEDURES OF NOTICE THEREOF, AND (C) GRANTING RELATED RELIEF**

The undersigned hereby certifies as follows:

1. On August 4, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion For Entry of An Order (A) Establishing Bar Dates and Related Procedures For Filing Proofs of Claim, Including Claims Arising Under Section 503(b)(9) of the Bankruptcy Code, (B) Approving the Form, Manner, and Procedures of Notice Thereof, and (C) Granting Related Relief* [D.I. 228] (the “**Bar Date Motion**”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801 (the “**Bankruptcy Court**”). Pursuant to the Bar Date Motion, the Debtors are seeking entry of an order (a) establishing deadlines by which a creditor must file a proof of claim in their chapter 11 cases; (b) establishing related procedures for filing proofs of claim; (c) approving the form and manner of noticing such

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

deadlines, including the form of notice of the bar dates; (d) approving mailing procedures with respect thereto; and (e) granting related relief, all as set forth in greater detail in the Bar Date Motion.

2. Pursuant to the *Notice of Motion and Hearing*, filed and served contemporaneously with the Bar Date Motion, objections or responses to the Bar Date Motion were to be filed and served no later than 4:00 p.m. (Eastern Daylight Time) on August 18, 2023 (the “**Objection Deadline**”). A hearing to consider the relief requested in the Bar Date Motion is currently scheduled to take place before the Bankruptcy Court on August 30, 2023 starting at 2:00 p.m. (Eastern Daylight Time).

3. Prior to the Objection Deadline, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) provided informal comments to the Bar Date Motion (the “**Informal Response**”).

4. Other than the Informal Response, as of the date hereof, the Debtors have not received any other responses or objections in connection with the Bar Date Motion, nor do any objections thereto appear on the Bankruptcy Court’s docket in the Debtors’ chapter 11 cases. To fully resolve the Informal Response, the Debtors have prepared a revised form of order (the “**Revised Order**”) in connection with the Bar Date Motion. A copy of the Revised Order is attached hereto as **Exhibit A**. A redline, comparing the Revised Order against the form of order originally filed along with the Bar Date Motion is attached hereto as **Exhibit B**.

5. The Revised Order has been circulated to (i) the Debtors; (ii) the U.S. Trustee; and (iii) proposed counsel to the Creditors’ Committee, and each of the parties to whom the Revised Order was circulated has indicated that it has no objection to the entry of the Revised Order.

6. The Debtors therefore respectfully request that the Bankruptcy Court enter the Revised Order, substantially in the form attached hereto as **Exhibit A**, at its earliest convenience.

*[Remainder of page intentionally left blank.]*

Dated: August 23, 2023

Respectfully submitted,

/s/ Jason M. Madron

**RICHARDS, LAYTON & FINGER, P.A.**

Kevin Gross (No. 209)  
Daniel J. DeFranceschi (No. 2732)  
Paul N. Heath (No. 3704)  
Amanda R. Steele (No. 5530)  
Jason M. Madron (No. 4431)  
James F. McCauley (No. 6991)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
gross@rlf.com  
defranceschi@rlf.com  
heath@rlf.com  
steele@rlf.com  
madron@rlf.com  
mccauley@rlf.com

*Proposed Co-Counsel to Debtors and  
Debtors in Possession*

**WHITE & CASE LLP**

Thomas E Lauria (admitted *pro hac vice*)  
Matthew C. Brown (admitted *pro hac vice*)  
Fan B. He (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
tlauria@whitecase.com  
mbrown@whitecase.com  
fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)  
111 South Wacker Drive, Suite 5100  
Chicago, IL 60606  
Telephone: (312) 881-5400  
jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)  
Doah Kim (admitted *pro hac vice*)  
RJ Szuba (admitted *pro hac vice*)  
555 South Flower Street, Suite 2700  
Los Angeles, CA 90071  
Telephone: (213) 620-7700  
rkampfner@whitecase.com  
doah.kim@whitecase.com  
rj.szuba@whitecase.com

*Co-Counsel to Debtors and  
Debtors in Possession*